

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Marjory J. Salazar,

Debtor

CHAPTER 13

CASE NO. 20-13966-PMM

Fay Servicing, LLC as Servicer for, Wilmington
Savings Fund Society, FSB, not in its individual
Capacity but solely as Owner Trustee of CIM
Trust 2021-NR4,

Movant

vs.

Marjory J. Salazar

Debtor

**ANSWER TO CERTIFICATION OF DEFAULT OF FAY SERVICING, LLC AS
SERVICOR FOR WILMINGTON SAVINGS FUND SOCIETY, FSB NOT IN ITS
INDIVIDUAL CAPACITY BUT SOLELY AS OWNER TRUSTEE OF CIN TRUST
2021-NR4 FOR RELIEF FROM AUTOMATIC STAY**

Debtor, by and through her attorney, Brenna Hope Mendelsohn, Esquire, hereby responds to this Certification of Default of Fay Servicing, LLC as Servicer for, Wilmington Savings Fund Society, FSB, not in its individual Capacity but solely as Owner Trustee of CIM Trust 2021-NR4 for Relief from the Automatic Stay as follows:

1. Debtor avers that payments under the Stipulation filed with this Honorable Court are current or will be current by the hearing date and respectfully requests this Honorable Court conduct a Hearing with respect to the alleged default.

WHEREFORE, Debtors respectfully request this Honorable Court deny the Motion to Fay Servicing, LLC as Servicer for, Wilmington Savings Fund Society, FSB, not in its individual Capacity but solely as Owner Trustee of CIM Trust 2021-NR4 for Relief from Automatic Stay.

Respectfully Submitted,

Dated: September 21, 2023

By: /s/ Brenna H. Mendelsohn
Brenna H. Mendelsohn, Esquire
Attorney for Debtor